

Momentive Performance Materials Inc.

10851 Energy Highway Friendly, WV 26146 momentive.com

April 27, 2017

Mr. Kenan Cetin WVDEP – Division Land Restoration Office of Environmental Remediation 601 57th Street SE, Room 1077 Charleston, WV 25304

Re:

2017 First Quarter Corrective Action Update MPM Silicones, LLC – Sistersville Plant EPA ID No. WVD004325353

Dear Mr. Cetin:

This letter report is MPM Silicones, LLC's quarterly corrective action update for the reporting period of January 1, 2017 through March 31, 2017 as specified in the above referenced hazardous waste management renewal permit, module X, section H-1 which became effective May 30, 2008. Beginning July 1, 2011 we are providing Corrective Action Updates quarterly rather than bi-monthly in accordance with the Class 2 modification of our RCRA permit approved by WVDEP on May 19, 2011.

1. Introduction:

The Permit requires the following corrective actions at the Facility:

Permit Reference	Corrective Action Area	Corrective Action Requirements
G-3b	North Inactive Site	Eartheri cover inspection & maintenance Annual groundwater monitoring
G-3c	South Inactive Site	Ground cover inspection Quarterly groundwater monitoring
G-3d	Waste Water Treatment System	Equipment inspection Surface impoundment leak rate monitoring
G-3e	Sludge Pond and BTEX Area	Groundwater recovery well operation Quarterly groundwater monitoring

2. Work Completed During the Reporting Period:

Activities during the Reporting Period relating to these corrective actions are described below.

G-3b North Inactive Site - The earthen cover, diversion ditches and the banks of Sugar Camp Run were inspected on March10.

<u>G-3c South Inactive Site</u> – Quarterly groundwater sampling and inspection of the ground cover were completed the week of March 19. Analytical results will be reported in the annual corrective action report as specified in Section H-2 of Module X.

G-3d Waste Water Treatment System – The permit requires reporting and additional actions if the monthly average leakage rate exceeds 750 gallons per day for the collection sumps of either surface impoundment (reviewed weekly). Both sumps averaged less than 197 gallons per day during this period.

The East UNOX reactor was shut down, cleaned and inspected the week of March 5.

G-3e No.3 Sludge Pond and BTEX Area – Quarterly groundwater sampling was completed the week of March19. Analytical results will be reported in the annual corrective action report as specified in Section H-2 of Module X.

3. Summary of findings:

G-3b, G-3c & G-3e - No findings this period.

G-3d Waste Water Treatment System - Both of our surface impoundment collection sumps averaged less than 197 gallons per day (on a monthly basis) during the reporting period.

4. Changes made during the reporting period:

G-3b, G-3c, G-3d and G-3e - No changes were made during the reporting period.

5. Problems encountered and actions taken to rectify problems:

G-3b, G-3c and G-3d - No problems were encountered during the reporting period.

6. Changes in Facility Personnel:

G-3b, G-3c, G-3d and G-3e - No changes were made during the reporting period.

7. Projected Work During the Next Reporting Period:

<u>G-3b North Inactive Site</u> – Work next period (April-June) will include scheduled inspections of the earthen cover, diversion ditches and the banks of Sugar Camp Run and annual groundwater monitoring scheduled for the week of June 4.

<u>G-3c South Inactive Site</u> – Work next period (April-June) will include scheduled inspection of ground cover and quarterly groundwater monitoring scheduled for the week of June 4.

<u>G-3d Waste Water Treatment System</u> – Work next period (April-June) will include continued weekly evaluation of monthly average leakage rates for the surface impoundments. During the week of April 23, sludge is scheduled to be removed and dewatered from the Panic Pond.

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<u>G-3e No.3 Sludge Pond and BTEX Area</u> – Work next period (April-June) will include continued operation of the groundwater recovery well and quarterly groundwater monitoring scheduled for the week of June 4.

As required by Condition I-I of our permit, the following certification is being made:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions concerning this report, please contact Vic Cwynar at (304) 652-8612 or by email at victor.cwynarir@momentive.com.

Sincerely,

MPM SILICONES, LLC

Chad McKnight

Sr. Director of Operations

GC:

John Garner - MPM Steve Freed - MPM Sanat Bhavsar - MPM Paul Z. Meyer- Chemtura Talal Fathallah - WVDEP Bill Wentworth - USEPA Sudhir Patel - WVDEP State Correspondence File